#### Fill in this information to identify the case:

Debtor 1 Erin Rena Ball

Debtor 2 Adam Christopher Ball

(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of PA

Case number 19-04194 HWV

### Form 4100R

## **Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1	Mortgage Inf	formation			
Name	of Creditor:	M&T Bank	Court claim no. (if k	nown): 6	
Last 4 digits of any number you use to identify the debtor's account: 1942  Property address:					
·	,	214 Lartry Drive Red Lion, PA 17356			
Part 2	Prepetition I	Default Payments			
Check one:					
☑ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.					
☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:					
Part 3		Mortgage Payment			
Check one:					
The	next postpetition pay	yment from the debtor(s) is due on:	01 / 2024		
☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.					
Cred a.		total amount remaining unpaid as of the date of ngoing payments due:	this response is:	(a)	\$
b.	Total fees, charges	, expenses, escrow, and costs outstanding:		+ (b)	\$
C.	Total. Add lines a a	and b.		(c)	\$
		debtor(s) are contractually obligated for (s) that first became due on:			

Form 4100R

Response to Notice of Final Cure Payment

page 1

#### Part 4:

#### **Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

#### Part 5:

Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

☐ I am the creditor.

I am the creditor's authorized agent.

Brent Lemon

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

\*/s/ brent J. Lemon

\_\_\_\_

07 Nov 2024, 12:04:51, EST

KML Law Group, P.C. 701 Market Street, Suite 5000 Philadelphia, PA 16106 215-627-1322 bkgroup@kmllawgroup.com

Attorney for Creditor

Date 11/07/2024

Form 4100R

Response to Notice of Final Cure Payment

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Erin Rena Ball fka Erin Grimm

**Adam Christopher Ball** 

**BK NO. 19-04194 HWV** 

Debtor(s)

Chapter 13

M&T Bank

Related to Claim No. 6

Erin Rena Ball fka Erin Grimm Adam Christopher Ball

VS.

Debtor(s)

Movant

Jack N. Zaharopoulos,

**Trustee** 

CERTIFICATE OF SERVICE
RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT

I, Brent J. Lemon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on <u>November 11, 2024</u>, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Adam Christopher Ball 214 Lartry Drive Red Lion, PA 17356

Erin Rena Ball fka Erin Grimm 214 Lartry Drive

Red Lion, PA 17356

Attorney for Debtor(s) (via ECF)

Dawn Marie Cutaia Fresh Start law, PLLC 1423 East Market Street York, PA 17403

Trustee (via ECF)
Jack N. Zaharopoulos
8125 Adams Drive
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail

Dated: November 11, 2024

/s/ Brent J. Lemon

Brent J. Lemon Attorney I.D. 86478 KML Law Group, P.C. BNY Mellon Independence Center 701 Market Street, Suite 5000 Philadelphia, PA 19106 (412) 475-8764 blemon@kmllawgroup.com